

COMPLAINT

(for filers who are prisoners without lawyers)

UNITED STATES DISTRICT COURT
~~Western~~ DISTRICT OF WISCONSIN

(Full name of plaintiff(s))

Robert Earl Alexander

Plaintiff

v.

Case Number:

22-cv-178-jdp

(Full name of defendant(s))

(to be supplied by Clerk of Court)

CO Molly Bender, CO Curtis L. Visser, CO Collin D. Visser, CO Randa K. Smit, CO Isaiah N. Sippel, SO Lyle Rickert, CO Michael V. Ruppert, CO John CO John Raiman, Sgt. Lyle A. Rickert, Sgt. Michael D. Rosher, Sgt. Matthew Sat Matthew Larson, Sgt. Marshall Watson, Warden Jason D. Benzel, Capt. Forke, Capt. Mary Mariana, Capt. David Schneider, Capt. Arndt Davis, Lt. Jeremy J. Beck, Security Director: Brian J. Greff, Lt. Coulbalt H. Batan, Lt. Gabriel Umentum, Sgt. Radke, Sgt. Steven J. Mueller, Sgt. Michael P. McNeill, Lt. Alicia Miller, Lt. Horton And ADA Coordinator. Kelly Salinas, Librarians Tamm A. DeVries And Michael R. Bernstein

Plaintiff is a citizen of Wisconsin, and is located at
(State)

Dodge Correctional Institution, West Lincoln, Waupun, WI
(Address of prison or jail) 53963-0701

(If more than one plaintiff is filing, use another piece of paper)

2. Defendant Please See The Various Listed Names Above! Thank You!
(Name)

is (if a person or private corporation) a citizen of _____

Robert Earl Alexander DOC# 070371

In The United States District Court
Of The Western District Of Wisconsin

Defendants Names Listed Below: Attach Sheet
Of Complaint-Pa 1. List Of Medical Staff Name Given Below

Dr Sara M. Enalish, Clinician Nurse 4; Anthony J.
Grunderson, HSM DCE Inf. Devrie; Hansel Health
Health Service Manager; Michelle R. Burton former
DCE Inf. Devrie; HSM; Capt Walker; Capt Joseph
Folke Nurse Amanda Johnson

and (if a person) resides at Addresses Of Each Listed Defendants ^(State, if known)
Above Are Unknown To Plaintiff! (Address, if known)
and (if the defendant harmed you while doing the defendant's job)

worked for Department Of Corrections, 3099 East
Washington Ave Madison WI ^(Employer's name and address, if known) Wis
CONSIN 53707-7925

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

1. The Names Plaintiff List Above And On
Several Attach Sheet Of Defendants Of DCI
Dodge Correctional Institution. Both "Medical
Staff And Security." As Well As Of Staff
From Other DCI Department. Such As Psycho
Psychological Service, Social Services, Records
Office, Including The Law Library! As Well As
"The DCI Warden Himself! Mr Jason D. Ben
zel Including DCI Security Director, Mr.
Brief Greff As Well As DCI (ADA) Americans
With Disabilities Act And Litigation Coordi

-Nator Ms Kelly Salinas, Corrections Program ^{Supervisor}

2. What Each Defendant Did? Well

In Short Each Defendant Plaintiff List Above Will "Shock The Conscience," "Outrageous," "So 'Outrageous' And 'Humiliating'; "Antiethical And Beneath Human Dignity!!!" "Calculated Harassment;" "Unprofessional, Inappropriate Behavior By Staff!" Which Demonstrate Utterly Shameful Behavior. That Range From Physical Abuse And Psychological Verbal Abuse Resulting In Significant Physical And Emotional Mental Distress/Anguish! Psychological Pain!

Which Violates The 8th Eight Amend ment Of The U.S. Constitution Which Constit ute "Cruel And Unusual Punishment" Standards! Evolving Standards That Mark The Standards Of Decency That Marks The Progress Of A Maturing Society... To The Point Of That Am-ounts To "The Unnecessary And Wanton Inf-lict Of Pain A "Subjective Component" The State

Plaintiff IS Deaf-Mute And Cannot Walk And Need Help Assistance from Medical Staff TO TRANS fer from Bed TO And from Toilet TO Defecate And TO And from Recreation And Dayroom Activities And Need A "Pusher" TO Push Plaintiff Anywhere Throughout DCI Prison.

This Court IS Aware Of Plaintiff Hearing And Speech Disabilities from Case NO 17 CV 861 Alexander J Tapio! Dr English Has Stop All Medical And Security staff from Using White Board TO Communicate with Plaintiff.

And All ^{Stop} Staff Or Inmate workers from Pushing PIOC TO And from Dayroom Activities. *Dr English Has Ordered All staff TO Halt ~~A~~ Stop Assisting PIOC TO Shower And Toileting TO Defecate. Now Plaintiff Has TO Defecate In His Bed And Staff Some Staff Refuse TO Remove Soil Urine/Defecated Bedding/ Linens And

At Times Left Faces/Urines In Cell.
 Leaving Plaintiff To Smell The foul odor
 Of Plaintiffs Own Body waste Causing
 Plaintiff To Become Nauseously Ill.

Dr English Refusing To Provide
 PIOC With Communication Notes That
 Are Medically Pertinent To PIOC/ Plaintiff.
 These Notes Involve Questions And
 Responses By Dr English And use Of
 Name Callings. Such As Calling Plaintiff
 A Bitch/ And Ass hole. That All west siders
 from Chicago Are pussies And assholes.

Other Inmate + Staff Witnessed And
 Heard Dr English And Officer/ CB Molly
 Bender Call Plaintiff Pussy And Asshole
 Because Molly Bender Was Present At The
 Time. And Officer Bender Also Call Plaintiff
 Pussy And Asshole.

Also Clinician H. Anthony J. Gunder
 son And Infirmary Manager Hausen, Dorrie

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C § 1331.

OR

☒ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$ Thousands Of Dollars

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

1. Damages A. Compensatory Damages. B. Nominal Damages. C. Punitive Damages (TRO) Temporary Restraining Order: 2. Preliminary And Permanent Injunctions. TO "Halt/Enjoin Compel/Stop DCI Defendants From Their Persistent Daily Ongoing Disrespectful Inappropriate" "Disparaging Discriminatory" Unprofessional Behavior At Once! Promptly At least Until This Lawsuit Is Settled ^{And Under} In The Federal And State Court And Laws Of Wisconsin Or Whatever This Court Deems Fit Thank You!

E. JURY DEMAND

I want a jury to hear my case.

☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 24th day of March 2022

Respectfully Submitted,

Robert Earl Alexander

Signature of Plaintiff

70371

Plaintiff's Prisoner ID Number

Dodge Correctional Institution (DCI)

1 West Lincoln Street, Waupun, Wisconsin
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FULL FILING FEE



I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Full Filing Fee form and have attached it to the complaint.



I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.